

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: 02/17/2009

Name of company covered by this certification: McDonough Telephone Cooperative

Form 499 Filer ID: 807666

Name of signatory: William K. Buchanan

Title of signatory: President

I, William K. Buchanan, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed 

Title President

Date February 17, 2009

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**Customer Proprietary Network Information (CPNI)  
Documentation  
For  
McDonough Telephone Cooperative  
PO Box 359  
Colchester, IL 62326**

**February 17, 2009**

- CPNI rules have been reviewed with all employees. Each employee has been provided with a hand out of CPNI rules and has been encouraged to ask questions.
- Employees with access to CPNI have been provided with an explanation of what information may be used to market services to customers as well as what may not be used.
- Currently, our company does not conduct any outbound marketing campaigns using CPNI. In the event that we decide to use CPNI to market, we do offer CPNI opt-out permission to our member's at the time of installation, anytime at the member's request and in a biennial mailing to all members.
- We do not disclose customer information to third parties for the marketing of third-party products.
- Measures have been taken for subscribers to set up a password to access account information. A backup authentication question has also been established for use when a subscriber forgets his/her password.
- Employees have been trained in the proper procedures to verify a subscriber's identity to release information and in the alternative steps that may be taken to release information to a subscriber without an established password.
- A letter of notification is sent to subscribers whenever a password, the answer to the authentication question, an email address or the mailing address is changed.
- A disciplinary process is in place in the cooperative's policy manual for improper use of any customer information. This includes CPNI as well as information that is not considered CPNI.